

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
FORT MYERS DIVISION**

**IN RE:**

**CASE NO.: 9:15-bk-07666-FMD  
CHAPTER 13**

**Cynthia Elizabeth Pantaleon-Hardy,**

**Debtor.**

**PRELIMINARY RESPONSE TO DEBTOR'S MOTION TO VALUE CLAIM**

**COMES NOW**, FEDERAL NATIONAL MORTGAGE ASSOCIATION ("Creditor"), by and through its undersigned counsel, as and for its Preliminary Response to the Debtor's Motion to Value Claim (DE # 19) and, in support thereof, states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on July 27, 2015.
2. Creditor holds a security interest in the Debtor's non-exempt real property, located at 3052 NW 96th St Miami, FL 33147, by virtue of a Mortgage which is recorded in the Public Records of Miami-Dade County, Florida in Official Record Book 26112 at Page 1847. Said Mortgage secures a Note in the amount of \$225,150.00.
3. The aforementioned Mortgage gives Creditor a first mortgage position on the subject property.
4. On or about November 30, 2015, Creditor filed its Proof of Claim (Claim No. 16) in this case, which claimed, among other things, principal balance totaling \$209,743.41.
5. On or about January 21, 2016, the Debtor filed an Motion to Value (DE# 19) seeking to value the property at \$84,000.00.
6. Creditor believes the property is worth in excess of \$84,000.00 and demands an opportunity to have the property appraised.

**WHEREFORE**, Creditor prays that a hearing on Debtor's Motion to Value Claim be scheduled no sooner than 60 days hence to afford Creditor sufficient time to have an appraisal of



the property performed, and for such other and further relief as the Court may deem just and proper.

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Preliminary Response to Debtors' Motion to Value Claim was served electronically or by U.S. mail, first-class postage prepaid, to the below mailing list on this 11th day of February, 2014.

Respectfully Submitted,

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